



The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES



Thomas S. Burack, Commissioner

July 28, 2015

Ms. Anne Arnold, Manager, Air Quality Planning Unit
U.S. Environmental Protection Agency
New England Regional Office,
1 Congress Street, Suite 1100
Boston, MA 02114-2023.

Re: New Hampshire Motor Vehicle Inspection and Maintenance On-Board
Diagnostics Program 2014 Annual Report

Dear Ms. Arnold:

Pursuant to Title 40 Code of Federal Regulations Part 51.366, the New Hampshire Department of Environmental Services is pleased to submit the 2014 Annual Report and the 2013-2014 Biennial Report for New Hampshire's On-Board Diagnostics (OBD) program. This report has been prepared in cooperation with the New Hampshire Department of Safety's Division of Motor Vehicles and the State's OBD program vendor, Gordon-Darby NHOST Services, Inc.

Should you have any questions or comments associated with this report please contact Rebecca Ohler at (603) 271-6749 or Rebecca.ohler@des.nh.gov.

Sincerely,

Craig A. Wright, Director
Air Resources Division

cc: Ariel Garcia, EPA
Richard Bailey, Director, DMV
Jennifer Jakubauskas, DMV



STATE OF NEW HAMPSHIRE

2014

Annual Motor Vehicle Inspection Program Report

July 31, 2015

**Prepared by
New Hampshire Department of Environmental Services
and
New Hampshire Department of Safety, Division of Motor Vehicles
with the assistance of Gordon-Darby, Inc.**



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1. INTRODUCTION

This is the 2014 Annual Report to the United States Environmental Protection Agency (EPA) on the New Hampshire motor vehicle inspection and maintenance (I/M) program for the period January 1 to December 31, 2014 (Calendar Year 2014). This report is compiled by the New Hampshire Department of Environmental Services (NHDES) with the assistance of the New Hampshire Department of Safety's Division of Motor Vehicles (DMV) and the state's On-Board Diagnostic inspection program (OBD) vendor, Gordon-Darby, Inc.

This Annual Report is required by Title 40 Code of Federal Regulations Part 51.366 and provides information on the following:

- Emissions test data;
- Quality assurance;
- Quality control; and
- Compliance and enforcement.

This report includes a narrative description of New Hampshire's OBD program, a summary of program data, and a discussion of goals for program improvements in the coming year. The program is applicable to Model Year (MY) 1996 and newer light-duty gasoline vehicles and MY 1997 and newer light-duty diesel vehicles. Inspections are conducted by a decentralized network of licensed inspection stations and are required annually statewide.

2. EXECUTIVE SUMMARY

In 2014, there were approximately 1.71 million registered vehicles in New Hampshire. Of those, 1,187,093 medium-duty motor vehicles MY 1996 and newer received an OBD inspection, the results of which were reported to the state electronically through the State vendor's OBD test stations utilized by licensed inspection stations.

A summary of the motor vehicle I/M program results is as follows:

- 1,187,093 OBD tests of light-duty vehicles were completed.
- 9,626 light-duty vehicle visual anti-tampering inspections were reported through the OBD test stations¹.
- 8.11% of vehicles subjected to the OBD test failed the initial test.
- 2.23% of reported vehicles subjected to the visual anti-tampering inspection failed the initial inspection.
- The overall OBD failure rate² was 9.57% for all MY 1996 to MY 2014 vehicles. This failure rate can be broken down as follows:
 - 19.87% failure rate for MY 1996 through MY 2000 vehicles
 - 8.32% failure rate for MY 2001 and newer vehicles
- An overall malfunction indicator lamp (MIL) "On" with DTCs stored rate of 2.97 % was recorded for vehicles receiving the OBD test.

¹ This number may not reflect all the pre-MY 1996 vehicles that underwent a visual anti-tampering inspection as the State of NH does not require inspection stations to submit the results of non-OBD II tests electronically per RSA 266:1 VII-a. (b) It also includes 41 1996 and newer vehicles that had both OBD II and visual inspections reported.

² Includes the percentage of all inspections, including re-tests.

The DMV may grant a one-time economic hardship time extensions to repair OBDII indicated emission system failures on a case-by-case basis, per NH State Law RSA 266:59-b, V. A total of 102 economic hardship extensions were provided in CY 2014. Pursuant to DMV Administrative Rule Saf-C 3222.08, the economic hardship extensions may not be renewed for any vehicle even in the event of ownership transfer.

In 2014, there were no “Electronic Administrator’s Certificates” issued per DMV Administrative Rule Saf-C 3222.07 for motor vehicles that were determined by the DMV to have either OBD failures or communications issues for which no definable solution was available.

3. PROGRAM OVERVIEW

3.1 APPLICABILITY OF I/M TO NEW HAMPSHIRE

New Hampshire is subject to federal I/M requirements due to previously elevated ozone levels in the southern and seacoast portions of the state that resulted in a nonattainment designation for ozone. On January 31, 2013, EPA formally approved DES’s SIP ozone redesignation request to attainment under the 1997 8-hour ozone NAAQS. In that same approval, EPA approved a 10-year maintenance plan for the former non-attainment areas. New Hampshire is also located in the Ozone Transport Region designated under Sections 176A and 184 of the Clean Air Act.

Under strict interpretation of Clean Air Act requirements, New Hampshire is required to implement a Low-Enhanced I/M program in Hillsborough, Rockingham, Merrimack and Strafford counties. However, due to the low volume of vehicles in the state and the high cost of conducting a full tailpipe testing program, New Hampshire submitted an Alternative Motor Vehicle I/M State Implementation Plan (SIP) in 1998.

The Alternative I/M SIP demonstrated superior environmental benefits through implementation of an Enhanced Safety Inspection (ESI) program that provided: a visual anti-tampering inspection for vehicles up to twenty years older than the current model year; implementation of an On-Board Diagnostics (OBD) inspection program throughout the entire state upon finalization of federal OBD program rules; implementation of a roadside diesel opacity testing program for heavy-duty diesel vehicles; and permanent emission reductions from a large in-state power plant. The I/M program provisions were codified in state statute RSA 266:59-b by House Bill 1513 in June 1998. In December 1998, the Environmental Protection Agency published a notice to approve New Hampshire’s Alternative I/M SIP in the Federal Register. Final approval occurred in January 2001.

New Hampshire’s I/M program also includes an anti-tampering inspection and a safety inspection. The statewide anti-tampering inspection (ESI) was implemented in 1999 for 1980 and newer vehicles, with a legislative revision to the program in 2005 that changed the vehicles subject to the inspection to those vehicles less than 20-model-years old. The anti-tampering and safety inspection data are not required to be electronically reported, therefore only those inspections entered into the system voluntarily are addressed in this report.

In June 2004, New Hampshire contracted with Gordon-Darby, Inc. to provide services through June 23, 2010, later extended to June 30, 2012. Under the contract Gordon-Darby, Inc. supplied all participating licensed NH inspection stations with OBDII testing hardware, software, technical support, and training on the computerized testing/reporting system known as the New Hampshire OBD and Safety Testing program, or “NHOST.” On September 29, 2011, New Hampshire issued a Request for Proposals (RFP) to continue the OBD inspection program and a five-year contract was awarded to Gordon-Darby, Inc. on May 9, 2012.

3.2 NEW HAMPSHIRE'S VEHICLE FLEET

In 2014, New Hampshire had 1,708,458 total vehicles registered. Of those vehicles, 1,691,791 required inspection and 1,391,662 are MY 1996 or newer light-duty vehicles subject to only the safety and OBD test. The registration inventory represents an end of year 2014 “snapshot” of New Hampshire’s vehicle fleet.

3.3 NEW HAMPSHIRE'S I/M PROGRAM

New Hampshire’s vehicle inspection program is administered by the New Hampshire Department of Safety, Division of Motor Vehicles (DMV) pursuant to Revised Statutes Annotated (RSA) Title XXI, Chapter 266, Section 266:59-b. The prime responsibility for air quality issues and policies falls on the New Hampshire Department of Environmental Services (DES). The two agencies work cooperatively to establish the rules to implement the program, conduct outreach and education activities, and prepare the annual report.

The NH vehicle inspection network is decentralized. As of December 31, 2014, there were 1,903 full- and part-time inspection stations operating 2,017 NHOST units or lanes. All privately owned motor vehicles are subject to an annual safety inspection within the birth month of the primary registered owner. Corporate and fleet vehicles are inspected in specified months; government vehicles are inspected no later than March. The annual light-duty vehicle anti-tampering and OBD inspections are conducted at the same time as the safety inspection.

Light-duty motor vehicles that are less than 20-years old receive an anti-tampering inspection consisting of a visual inspection for the presence and proper connection of the catalytic converter, gas cap, evaporative purge canister, positive crankcase ventilation valve and hoses, and the connection of the air injection pump/pulse air system. Per RSA 266:59-B IV, vehicle age is determined by subtracting the model year from the calendar year in which the inspection is taking place. All 1996 and newer light-duty gasoline vehicles (<8,500 pounds) and MY 1997 and newer light-duty diesel vehicles undergo an OBD test in lieu of the anti-tampering inspection.

New Hampshire’s vehicle inspection program is enforced by use of a highly visible windshield sticker. The sticker consists of two parts, a number indicating the month of inspection and a colored backing. Failure to have a current inspection sticker is a violation that can be enforced by all local and state law enforcement officers. The fine for an expired or missing inspection sticker is \$60 (NH RSA 266:5). DMV may suspend or revoke the registration of an un-inspected vehicle, or may refuse to register it.

New Hampshire law (NH RSA 266:59b) allows motorists 60 days for repairs for OBD failures. Motor vehicles that pass the state’s safety inspection, but fail the OBD test receive a temporary permit consisting of just the number portion of the inspection sticker. A vehicle is eligible for only one 60 day temporary permit during each inspection cycle. Motorists are likely to be pulled over for lack of the colored portion of the sticker. By presenting a copy of their OBD test report that shows they are within their 60-day grace period, a motorist can avoid a citation. Motorists that exceed the grace period are subject to the fines and consequences noted above.

Pursuant to DMV Administrative Rule Saf-C 3222.08, New Hampshire offers economic hardship time extensions on a case-by-case basis as determined by the DMV. Such extensions are for a single inspection cycle and cannot be re-issued for a given vehicle. The hardship extensions were initiated in CY 2007. A total of 102 time extensions were provided in CY 2014. In 2014, there were no “Electronic Administrator’s Certificates” issued per DMV Administrative Rule Saf-C 3222.07 for motor vehicles that were determined by the DMV to have either OBD failures or communications issues for which no definable solution was available.

4. OBD PROGRAM DATA REPORT

Title 40 Code of Federal Regulations, Subpart S, Section 51.365 contains the data collection requirements and Section 51.366 contains the data analysis and reporting requirements for motor vehicle I/M programs. A summary of New Hampshire's program is provided below. Supporting data is included in Appendices A & B of this report.

4.1 SECTION 51.366 - DATA ANALYSIS AND REPORTING

This report includes data from the entire CY 2013.

4.1.1 - 51.366(a) TEST DATA REPORT

Complete test data is provided in Appendices A & B.

(a)(1) The number of vehicles tested by model year and vehicle type.

In CY 2014, New Hampshire motor vehicle inspection stations inspected 1,196,688 light-duty vehicles (≤8500 pounds) that were MY 1995 and newer (subject to visual anti-tampering inspection or OBD inspection). Of that number 1,187,093 underwent an OBD inspection. A total of 9,595 were documented as having undergone only a visual anti-tampering inspection and 31 MY 1996 and newer vehicles had both OBD and visual inspection results recorded.

(2)(i)-(iv) The number and percentage of vehicles passing and failing initial tests and retests model year and vehicle type.

The passing and failing numbers and rates for initial tests and retests, and overall results on light-duty vehicles, based on pre- and post-1996 model years, are summarized in the table below. Also see Appendix A (a)(1) "Calendar Year 2014 – OBD Emissions Test Results."

Model Years '96 and later				Model Year '95			
Test		Number	Percent	Test		Number	Percent
Initial Test	Pass	1,090,828	91.89%	Initial Test	Pass	9,420	97.75%
	Fail	96,261	8.11%		Fail	217	2.25%
	Total	1,187,089			Total	9637	
Retests	Pass	69,490	78.64%	Retests	Pass	471	98.12%
	Fail	18,869	21.36%		Fail	9	1.88%
	Total	88,359			Total	280	
Overall	Pass	1,160,318	90.97%	Overall	Pass	9,891	97.76%
	Fail	115,130	9.03%		Fail	226	2.24%
	Total	1,275,448			Total	10,117	

(a)(2)(v) The number and percentage of vehicles receiving a waiver that initially failed.

The NH I/M Program does not allow for traditional waivers. Pursuant to DMV Administrative Rule Saf-C 3222.08, New Hampshire offers economic hardship one-year time extensions on a case-by-case basis as determined by the DMV. EPA guidance defines the I/M Waiver Rates as: "percentage of vehicles failing

initial I/M test and do not have to pass a retest.” On an annual basis, economic hardship extensions meet the EPA definition of a waiver.

The I/M waiver rate is expressed as the percentage of the vehicles that fail the I/M program, not as a percentage of the entire fleet. Therefore, for 2014, the NH I/M waiver rate is:

Number of economic hardship extensions (waivers) divided by the number of vehicles failing initial OBD test: $102/96,307 = 0.10\%$.

(a)(2)(vi) The number and percentage of vehicles with no known final outcome (regardless of reason).

The majority of these unknown outcomes were MY 1996 through 2001 vehicles. No final outcome (NFO) totals include: 1) vehicles that were initially tested, but not re-tested; and 2) vehicles failing initial tests and all re-tests. Re-tests that occur in different calendar years also affect the NFO totals. See Appendix A (a)(2) “Calendar Year 2012 – No Final Outcome Vehicles.”

Of the 1,196,684 vehicles that underwent visual and OBD testing, 17,685 or 1.50% were no final outcome (NFO) vehicles. These are vehicles that failed the initial test, first re-test and subsequent retests. Many of these vehicles are sold to states not requiring OBD testing, sold for scrap, or indefinitely stored, awaiting repairs or final disposition. EPA calculates the NFO percentage by comparing the number of NFO vehicles not receiving waivers (17,601) and the number of vehicles that initially failed the OBD test (96,261). This would yield a NFO percentage of 18.17%. EPA is concerned with NFO percentages exceeding the national average of 12% and in cases where states exceed this number, EPA recommends development of a Vehicle Identification Number (VIN)-based database for vehicles failing I/M tests and don’t receive a final pass. New Hampshire does track such data but lacks the resources to implement an enforcement program to ascertain the fate of NFO vehicles. In the future, New Hampshire is considering the use of a bar-code-based enforcement system wherein enforcement officers and state troopers in the field may use a mobile scan tools to check VIN-based bar codes on inspection stickers for on-road vehicles. This will allow enforcement officers to cross check on-road vehicles against the NFO database to help catch and remove illegally operating NFO vehicles. This option was not included in the 2012 – 2017 contract, but during contract discussions, Gordon-Darby, Inc. indicated they could provide such a mobile tool if New Hampshire wishes to pursue implementation.

(a)(2)(xi)-(xii) The number and percentage of vehicles passing and failing the on-board diagnostic check.

See Appendix A (a)(2) “Calendar Year 2014 - OBD Emissions Test Results.”

(a)(2)(xiii)-(xviii) The number and percentage of vehicles passing or failing the on-board diagnostic check and/or passing or failing the on-board diagnostic check and passing the tailpipe test.

These rules are not applicable to the New Hampshire program.

(a)(2)(xix)-(xxiii) The number and percentage of vehicles with MIL commanded on (or not) and diagnostic codes stored (or not) and readiness status.

- (xix) 103 vehicles tested had the malfunction indicator lamp (MIL) commanded on with no codes stored, or 0.01 %
- (xx) 62,457 vehicles tested had the MIL not commanded on, and diagnostic trouble codes (DTC) stored, or 5.51%
- (xxi) 38,568 vehicles tested had the MIL commanded on and DTCs stored, or 2.97%
- (xxii) 1,071,684 vehicles tested had the MIL not commanded on and no DTCs stored, or 82.41%
- (xxiii) 76,344 vehicles tested indicated one or more modules supported by the vehicle’s OBD system were not ready for evaluation, or 5.87 of those tested

See also Appendix A (a)(2) “2014 OBD Test Results – Light-duty Vehicles – All Test Sequences (Initial Tests and Retests.”

(a)(3)-(4) Initial Test Volume and Failure Rate by Model Year and Test Station.

The complete data set of test volume and failure rates by station and model year is included with this report as an electronic addendum to Appendix B.

4.1.2 - 51.366(b) QUALITY ASSURANCE REPORT

(b)(1)(i) The number of inspection stations and lanes operating throughout the year, and; (ii) for only part of the year.

New Hampshire had 1,620 stations operating throughout the year, and 283 stations operating for only a portion of the year for a total of 1,903 NHOST-equipped stations. Of the 2,017 NHOST units in operation in 2014, 1,726 operated the entire year and 291 operated for part of the year.

(b)(2) The number of inspection stations and lanes operating throughout the year that:

(i) Received overt performance audits in the year:

Beginning in 2012, DMV trained 8 Automotive Equipment Inspectors (AEIs) authorized under the Department of Safety to serve as full-time OBD station inspectors. AEIs overtly audited all 1,903 inspection stations at least once during 2014. This was a vast improvement over the previous system where State Troopers had OBD inspection duties added to their regular duties and were able to inspect only a small number of stations, each year.

(ii) Did not receive overt performance audits in the year:

There were no NHOST-equipped inspection stations that were not audited at least once in 2014.

(iii) Received covert performance audits in the year:

No covert audits were performed. The NHOST system uses sophisticated analyses of all OBD data and various “triggers” (discussed below) to identify anomalies and irregularities that might indicate fraud. This QA system allows the DMV to monitor a statewide decentralized system more effectively and efficiently³.

(ii) Did not receive covert performance audits in the year:

None of the 1,903 stations and 2,017 NHOST units received traditional covert audits in 2014.

(v) That have been shut down as a result of overt performance audits:

A total of 38 stations and 33 mechanics were investigated because of the Trigger Analysis data and overt auditing. Of those investigations, 12 hearings were held in CY 2014 with these results:

- Licenses revoked: 3 stations; 4 mechanics

(b)(3) Covert audits:

Straight review of station-specific OBD test data is a relatively inefficient approach to identifying anomalous stations. Instead, DOS worked with Gordon-Darby, Inc. to develop and use sophisticated electronic analysis “triggers” to evaluate the performance of the decentralized inspection stations and inspectors that comprise the New Hampshire I/M program network.

³ The NH DMV considers the triggers analysis to be a form of overt auditing because station owners submit their inspection data to the DMV electronically with no expectation of privacy.

The triggers-based analytical reports are produced on an on-demand basis by DMV staff to monitor inspections on an ongoing basis and to assist in investigations of specific stations or to search for particular patterns of potential violations or anomalies. For the system-wide reports, those stations flagged for review are submitted to State Police Troop G for follow-up by AEIs. Reports are also run for specific stations when requested by Troopers as part of their semi-annual audit of an inspection station. These individual reports are kept with the case files only in the event of successful disciplinary action and are not summarized annually. As a result of this system, copies of *periodic* reports are not available for submittal to EPA, since they were not produced by the data system. However, data regarding the failure rate for CY 2014 is available in Appendix B.

OBD triggers analysis was applied to the existing data to conduct remote overt audits of inspection stations to monitor fraud within the decentralized network of inspection stations. The use of trigger analysis maximizes the efficacy of available DOS staff resources in overseeing station/inspector performance. Easy identification of stations and inspectors that appear to have inconsistent test results enables DOS to quickly focus further investigative activities directly on these problem performers. This approach is much more efficient than spending large amounts of time analyzing data from the complete set of more than 1,900 decentralized inspection stations operating in the New Hampshire I/M program.

The concept of using analysis triggers for identifying questionable station/inspector performance, particularly in decentralized inspection networks, is fairly well known in the I/M industry and to EPA. In fact, personnel now working for New Hampshire's I/M contractor, Gordon-Darby, previously developed a comprehensive triggers best practices report⁴ for EPA while working for the air quality consulting firm of Sierra Research. A key element of the triggers analysis method is to compare the performance of each station or inspector in an inspection network against the performance of the other stations/inspectors. By comparing relative performance, these computational methods minimize the impact of possible biases in the test data. Another important element is to ensure that analysis datasets are of sufficient size to ensure statistically significant results; i.e., that station and inspector anomalies are not just occurring because of the small number of tests involved with these stations/inspectors.

The New Hampshire analysis triggers essentially follow the basic approaches and computational methods discussed in the referenced Sierra Research report. Key elements include:

- Use of computational methodologies based on the referenced best practices document. For example, low volume stations or inspectors and those with low subgroup volumes (i.e., for certain model years) are excluded from analysis to ensure statistically valid results.
- Comparison of individual inspection station/inspector performance relative to the rest of the inspection network in order to identify poorly performing outliers.
- Use of certain triggers (e.g., OBD fingerprinting) to compare inspection results to Gordon-Darby, Inc. developed truth tables to identify likely instances of fraudulent testing⁵.
- Standardization of triggers to obtain a standard scale of performance. Lower scores indicate better performance and higher scores reflect poorer performance. This enables comparison of all results on an equal basis as well as meaningful graphical presentations.
- Development of selectable analysis periods, including capability to perform before-and-after analysis of station/inspector performance relative to audits and other enforcement visits.
- Automated functionality that enables quick drill-down and root pattern analysis of inspections conducted by identified poor performers.

⁴ "QA/QC Procedures Based on Program Data and Statistical Process Control Methods for I/M Programs," prepared for U.S. Environmental Protection Agency, Certification and Compliance Division, by Sierra Research, Inc., Report No. SR01-10-02, October 2001.

⁵ For this analysis, the NH inspection results are run against the GD truth tables are compared by the software.

Specific triggers programmed into New Hampshire's automated I/M data system includes the following:

- OBD Test Rejection Rate (Failure Rate)
- OBD Communication Protocol
- OBD Readiness Monitors
- Safety Defect
- No Voltage
- Weighted Trigger Score (WTS)

The listed Safety Defect trigger applies to New Hampshire's vehicle safety inspection and is therefore not relevant to this discussion of OBD performance triggers. The remaining triggers are applicable. The first of these, OBD Failure Rate, achieves the same objective but in a much more efficient manner as would a comprehensive analysis of station-specific test results from the entire New Hampshire I/M network, by flagging stations that have either an abnormally high, or abnormally low failure rate.

The OBD Communication Protocol and Readiness Monitors triggers are powerful tools designed to identify suspected instances of clean scanning, in which a clean vehicle is fraudulently tested in place of the vehicle actually subject to OBD inspection. They compare OBD test results collected from all the stations to those contained in truth tables developed by Gordon-Darby, Inc.. Such "OBD fingerprinting" has been found to be an excellent method for quickly identifying problem OBD test performers.

Trigger analysis results available to New Hampshire DOS from the I/M data system enable DOS staff to efficiently and effectively pursue follow-up investigations and enforcement actions against problem stations and inspectors. All stations are reviewed during trigger audits. Anomalies and outliers are further scrutinized and enforcement action is taken when necessary. Gordon Darby, Inc. continuously develops new triggers as fraudulent motorists and inspectors develop new ways to "beat the system." In 2012, five new triggers were implemented. These were: readiness mismatch, protocol mismatch, EVIN mismatch, sticker gap and time between tests.

(b)(3)(i)-(iv) The number of covert audits conducted with the vehicle set to fail and resulting in a false failing.

None of the 2,017 NHOST-equipped inspection stations received a covert performance audit.

(b)(4)(i)-(ii) The number of inspectors and stations that were suspended, fired, or otherwise prohibited from testing.

A total of 38 stations and 33 mechanics were investigated because of the Trigger Analysis data auditing. Of those investigations, 12 hearings were held in CY 2014, with these results:

- Licenses suspended 1 to 5 years: 4 stations; 6 mechanics
- Licenses suspended 3 months to 1 year: 2 stations; 2 mechanics

It is the inspection station's responsibility to inform the DMV when an inspector is fired. Upon receiving written notice from an inspection station that an inspector no longer works at the station, that inspector's ability to access the NHOST system is removed by the DMV. The DMV also maintains a "sticker denial" list that prevents inspection stations from purchasing state inspection stickers if they refused to participate in the electronic reporting program or in the event they are suspended as a result of an administrative hearing. This approach is extremely successful in gaining compliance. Specific numbers are not available, however, because the list changes from day-to-day. The average number of stations on the list throughout the year is approximately 30 stations.

(b)(4)(iii) The number of inspectors and stations that received fines.

The DMV evaluates circumstances on a case-by-case basis and normally seeks suspensions rather than imposing fines for violations of I/M rules. One station did receive fines as a result of administrative hearings in 2014.

(b)(5) The number of inspectors licensed or certified to conduct testing.

In CY 2014, 5,715 inspectors were licensed in New Hampshire.

(b)(6)(i)-(ii) The number of hearings held to consider adverse actions against inspectors and stations and resulting in adverse actions against inspectors and stations

In CY 2014, there were 12 hearings for emissions-related rules infractions.

(b)(7) The total amount collected in fines from inspectors and stations by type of violation.

IN CY 2014, no fines were imposed as the result of overt or covert audits. It is DMV policy to seek suspensions rather than impose fines for violations of I/M rules in most cases.

(b)(8) - (9) The total number of covert vehicles and covert auditors available for undercover audits over the year.

None. As previously discussed, in section (b)(3), the NHOST system analyses of OBD data provides for easy and cost effective identification of stations and inspectors that appear to have inconsistent test results. This enables DOS to quickly focus further investigative activities on these problem performers more efficiently than covert auditing.

It should also be noted that with the implementation of the Automotive Equipment Inspector (AEI) program, enforcement actions have decreased from previous years. This is because the majority of triggers-detected problems are a result of inspector error or lack of understanding, not fraudulent activity. By proactively assisting all 1,917 stations, many potential problems were prevented, resulting in fewer enforcement actions. This should be considered a success, not a failure.

4.1.3 - 51.366(c) QUALITY CONTROL REPORT

(c)(1) The number of emission testing sites and lanes in use in the program.

(c)(2) The number of equipment audits by station and lane;

(c)(3) The number and percentage of stations that have failed equipment audits; and

(c)(4) Number and percentage of stations and lanes shut down as a result of equipment audits.

NH's OBD-based inspection program does not utilize emissions testing equipment subject to equipment quality control audits, such as those specified in sections 51.359(a), (b), (c), and (d). The NHOST system does comply with the performance features and functional characteristics of computerized emission test systems as outlined in 51.538(a) and (b), respectively. The NHOST system also meets the requirements of the following regulations:

- § 85.2207 On-board diagnostics test standards
- § 85.2222 On-board diagnostic test procedures
- § 85.2223 On-board diagnostic test report
- § 85.2231 On-board diagnostic test equipment requirements

The NHOST system continually monitors both individual unit/component performance and overall system operations. Issues with equipment, such as failures and malfunctions, are often dealt with directly

by Gordon-Darby, Inc. and the station operators. In 2014, Gordon-Darby, Inc. managed a variety of equipment issues, most of which were resolved by merely replacing parts/supplies due to normal wear/usage. All equipment issues were resolved and there were no shut downs as a result of equipment audits. Of the 1597 issues, 85 were fixed on-site, 843 were managed by shipping replacement parts/supplies to the station and 669 were fixed by telephone-based troubleshooting.

Accuracy of the vendor's equipment has not been an issue. Because the NHOST system continually monitors individual unit/component performance as well as overall system operations, there were no "failures," but rather, requests for technical support and/or parts replacement. The vendor is responsible for maintaining and supporting the testing equipment, there were no issues with incompatible testing equipment.

The document security required by paragraph (e) of this section is satisfied by New Hampshire's program. The inspection stickers issued during the annual inspection are each identified with a unique serial number and DMV distributes the stickers in a manner in which all stickers can, and are, easily accounted for. Inspection Stations are required to keep unused stickers in a secure area.

4.1.3 - 51.366(d) ENFORCEMENT REPORT

(1)(i) An estimate of the number of vehicles subject to the inspection program, including the results of an analysis of the registration data base.

In CY 2014, all MY 1995 and newer passenger cars and light-duty trucks are subject to either visual emissions components inspection or OBDII. This results in a fleet of approximately 1,404,397 subject vehicles.

(1)(ii) The percentage of motorist compliance based upon a comparison of the number of valid final tests with the number of subject vehicles.

1,187,097 subject vehicles ('96 and newer; < 8,500 lbs) were tested for OBD during 2014. NHDMV records indicate that 1,391,662 subject vehicles were registered in the state in NH resulting in a compliance rate for vehicle OBD tests of 85.3%.

The compliance rate for the pre-1996 vehicles subject to the visual anti-tampering inspection cannot be quantified. State Statute RSA 266:59-b (I) exempted inspection stations from transmitting the pre-1996 vehicle inspection results electronically. As a result, there is no central database of the inspection outcomes for this vehicle cohort.

(d)(1)(iii) The total number of compliance documents issued to inspection stations;

(d)(1)(iv) The number of missing compliance documents;

See: (d)(4)(i) below.

(d)(1)(v) The number of time extensions and other exemptions granted to motorists

There were 102 time extensions granted to motorists in 2014.

(d) (1)(vi) The number of compliance surveys conducted, number of vehicles surveyed in each, and the compliance rates found.

No compliance surveys were conducted.

(d)(2) Registration denial based enforcement programs.

New Hampshire does not have a registration denial based enforcement program.

(d)(3) Computer-matching based enforcement programs.

New Hampshire does ~~not have a computer-matching~~ based enforcement program.

(d)(4)(i) - (ii) Sticker-based enforcement systems shall provide the following additional information on enforcement: (regarding sticker security and vehicle classification fraud)

New Hampshire's I/M program is enforced via clearly visible inspection stickers on the windshield of each registered vehicle. Sticker inventory is maintained by the DMV's Bureau of Registration. All inspection stickers are accounted for either as sold to an inspection station or as returned to the DMV. In CY 2014, a total of 1,445,456 inspection stickers were issued to inspection stations. The Department of Safety's mainframe IDMS database codes sticker inventory records as sold, returned-used, returned-unused, or reported stolen, damaged, or lost. For CY 2014, the inspection sticker database showed the following:

Returned – Sticker Used:	1,326,403
Returned Unused:	60,937
Reported Stolen:	421
Reported Lost:	260
Returned Damaged:	13,308
Not returned by year's end:	44,127 ⁶

Inspection sticker inventory and distribution is controlled and monitored by the DMV. Administrative rules require all inspection stations to keep all inspection sticker booklets secured at all times. State Police representatives verify this with spot checks of inspection stations. The rules also require every inspection station to immediately notify the local police and the DMV in the event that they discover or suspect that any inspection stickers may have been lost or stolen. The serial numbers of any stickers that have been reported lost or stolen are entered into the DOS's mainframe database and State Police representatives are assigned to investigate all such incidents. All safety inspection stickers contain a variety of security features, which are specifically designed to prevent counterfeiting. The serial number of each inspection sticker, which is affixed to a vehicle after it has passed the annual safety inspection, is reported to the DMV by the inspection station issuing the sticker electronically. Inspection sticker data for all OBD-required inspections are automatically reported electronically and entered into the Vehicle Inspection Database (VID). This facilitates system wide compliance, quality assurance, and reduces the time and resources necessary to investigate and prosecute inspection sticker fraud and counterfeiting.

(d)(4)(iii) Sticker-based enforcement systems shall provide the following additional information regarding parking lot surveys.

In CY 2014, State Police representatives did not conduct any parking lot sticker surveys. In New Hampshire uninspected vehicles are not illegal unless they are being operated on a public way. The windshield compliance sticker used to identify vehicles with a valid safety and OBD inspection are routinely looked for by both State and local law enforcement officials. Therefore, routine traffic enforcement detects the majority of un-inspected vehicles if they are being driven on the state's roadways.

⁶ This number includes sticker booklets that are still being used. Inspection stations have 30 days to return used sticker booklets (25 per book) to the DMV following the end of the month in which the last sticker in the booklet was issued

Although New Hampshire does not conduct parking lot sticker surveys, the NH State Police uses data from the Gordon-Darby, Inc. NHOST system's VID (Vehicle Inspection Database) to closely monitor compliance by both inspection stations and individual motorists. A secure Internet portal to the NHOST system's VID is accessible to only authorized personnel. Custom software, included as part of Gordon-Darby's service to the State of New Hampshire, analyzes all inspection data on all vehicles and all inspection stations to identify anomalies and inconsistencies that might indicate fraud. By employing a sophisticated system of triggers and trends analysis, the NHOST system is able to flag individual tests, inspection stations, or even individual mechanics as being worthy of further scrutiny. DMV staff is also able to run ad hoc queries ~~against~~ the VID to analyze data from any desired perspective and to scrutinize individual tests, inspection stations, mechanics, or vehicles.

In addition to the visual enforcement program discussed above, New Hampshire's program effectively prevents motorists from changing the fuel type or the weight class on the vehicle registration or from falsely registering a vehicle out of the program area as the program is statewide. The proprietary software that is used throughout the New Hampshire OBD program is designed to recognize the OBD "fingerprint" of every vehicle tested. This is accomplished by decoding the VIN, analyzing the various engine system readiness monitors and other factors, and then comparing these results to the expected profile of the vehicle being tested. In CY 2014, NH State Police representatives utilized this and other high-tech applications for monitoring and enforcement of the State's I/M program.

4.1.5 - 51.366(e) ADDITIONAL REPORTING REQUIREMENTS

Additional Reporting Requirements are included in the 2013 – 2014 Biennial Report.

5. GOALS FOR 2015 and 2016

1. On-Demand Sticker Printing, a 2014 goal, remains the capability most requested by the inspection station owners and inspectors. At the request of the New Hampshire OBD Advisory Committee in 2014, DMV reviewed existing statutes and rules to determine what regulatory changes would be necessary to implement on-demand sticker printing. The DMV has determined that both statutory and rules changes will be necessary to complete the transition to on-demand sticker printing. New Hampshire expects to pursue the necessary legislative and regulatory changes to implement on-demand sticker printing in the 2015/2016 timeframe.
2. Education and Outreach - Education and outreach remain an on-going goal of the program. In 2014 five public listening sessions were held around the state to allow inspection station owners and inspectors to voice their suggestions and issues with the program. The following suggestions or issues were raised and will be addressed in the coming year:
 - a. Better handouts for town clerks and inspection stations that explain why OBD is required and to explain failures.
 - b. On-demand sticker printing – as noted above, this action requires statutory and administrative rule changes.
 - c. Delay between when a technician passes the certification class and is entered into the system so he can conduct inspections. DMV noted this delay is due to the time necessary to conduct background checks and process the information.

- d. Hardship time extensions – the time extension is valid until the following year's inspection. There were questions regarding availability of financial support for those who cannot afford repairs. In some cases the technical schools will repair cars as part of the curriculum and Unemployment Security has some financial assistance so people in their system can have their cars repaired. The State can help address this issue by providing this information to all inspection stations.
- e. The "notes" section on the OBD inspection form is too small – technicians were encouraged to only use that space for necessary information that is not already captured elsewhere on the form.
- f. There were comments regarding conflicts within the existing inspection regulations. It was noted that the rules were being revised in 2015.

With the exception of the request for on-demand sticker printing and problems with the existing rules, these are all minor problems. Attendance at the listening sessions was low. Overall very few complaints about either the program or the equipment were heard.

3. Rules Revision –Saf-C 3200's scheduled expiration in June 2015 was extended for six months by filing an intent to revise. Draft rules are currently under review by DMV and NHDES and have been shared with EPA. and a listening session complaint referred to minor problems with the present rules. In the winter of 2014, DMV began a revision of Saf-C 3200 that regulates OBD testing, roadside diesel opacity testing, anti tampering inspections, safety inspections and OBD sticker management. Although the necessary legislative and rules changes for on-demand sticker printing were not ready for inclusion in the Saf-C 3200 adoption proposal, certain changes to allow for on-demand printing were included in the draft Saf-C 3200 revision.
4. SIP Revision – NHDES and DMV will collaborate in the revision to Saf-C 3200 and NHDES will submit a SIP revision request upon final adoption of the revised rules.
5. Low Mileage Vehicle Exemption - One additional 2014 goal was to consider an exemption for vehicles driven less than a certain number of miles per year. Low mileage exemptions were observed in other states generally using a "de minimis" level of 5,000 miles per year or less as the cut off point for an exemption. A review of Gordon Darby database information shows about 2,500 vehicles tested, or less than 1% of the NH fleet, traveled less than 5,000 miles per year. Since there have been no requests for an exemption based on low vehicle usage and it would affect only a very small portion of the fleet, New Hampshire has chosen not to adopt a low mileage vehicle exemption.
6. Medium-duty Vehicle and Diesel OBD Testing – Although New Hampshire is in attainment with both the 1997 and 2008 8-hour ozone standard, EPA's new standard to be released in October, 2015, will likely cause a portion of southern New Hampshire to revert to non-attainment status. In that case, NHDES will be required to submit a new ozone SIP detailing actions the State will take to achieve the necessary emissions reductions to achieve attainment. Although strategies affecting all major emissions sources will be addressed, transportation emissions reductions, if needed, could be accomplished through the addition of medium-duty vehicles or heavy-duty diesel vehicles into the OBD testing program. These strategies will be further explored, in 2015 and 2016.

Appendices A & B

**Appendix A: Anti Tampering and OBD Inspection Data Report Tables
(attached hard copy)**

**Appendix B: Initial Test Volume and Failure Rate by Model Year and
Test Station (attached CD)**



STATE OF NEW HAMPSHIRE

2014

Annual Motor Vehicle Inspection Program Report

Appendix A

Anti-tampering and OBD II Inspection Data

July 31, 2015

Prepared by

**New Hampshire Department of Environmental Services
New Hampshire Department of Safety, Division of Motor Vehicles**
with the assistance of Gordon-Darby NHOST Service, Inc.



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4.1.1 - 51.366(a) Test Data Report

The program shall submit to EPA by July of each year a report providing basic statistics on the testing program for January through December of the previous year, including:

(a)(1) The number of vehicles tested by model year and vehicle type

Calendar Year 2014 – Number and Type of Vehicles Tested				
Model Year	Vehicle Type	OBD	Visual	Grand Total
2016	L	37	0	37
2015	L	19,929	0	19,929
2014	L	102,411	2	102,413
2013	L	95,157	2	95,159
2012	L	92,673	3	92,676
2011	L	86,922	1	86,923
2010	L	73,342	1	73,343
2009	L	59,690	2	59,692
2008	L	79,545	3	79,548
2007	L	78,091	2	78,093
2006	L	73,820	0	73,820
2005	L	76,114	3	76,117
2004	L	71,023	0	71,023
2003	L	62,560	3	62,563
2002	L	53,898	2	53,900
2001	L	43,898	1	43,899
2000	L	38,067	0	38,067
1999	L	29,139	1	29,140
1998	L	22,751	2	22,753
1997	L	16,959	1	16,960
1996	L	11,067	2	11,069
1995	L	0	9,595	9,595
Grand Total		1,187,093	9,626	1,196,719

(a)(2) By model year and vehicle type, the number and percentage of vehicles:

- (i) Failing initially, per test type;
- (ii) Failing the first retest per test type;
- (iii) Passing the first retest per test type;
- (iv) Initially failed vehicles passing the second or subsequent retest per test type;
- (v) The number and percentage of vehicles receiving a waiver that initially failed - The NH I/M Program does not allow for waivers.

Calendar Year 2014 – OBD Emissions Test Results						
Year	Type	TEST SEQUENCE	PASS	FAIL	Total	% Fail
2016	L	1. INITIAL TEST	36	1	37	2.70%
	L	2. FIRST RE-TEST	1	0	1	0.00%
	L	3. SUBSEQUENT RE-TEST	0	0	0	0.00%
2015	L	1. INITIAL TEST	19,850	79	19,929	0.40%
	L	2. FIRST RE-TEST	72	2	74	2.70%
	L	3. SUBSEQUENT RE-TEST	2	0	2	0.00%
2014	L	1. INITIAL TEST	101,946	465	102,411	0.45%
	L	2. FIRST RE-TEST	440	9	449	2.00%
	L	3. SUBSEQUENT RE-TEST	9	1	10	10.00%
2013	L	1. INITIAL TEST	94,654	503	95,157	0.53%
	L	2. FIRST RE-TEST	558	10	568	1.76%
	L	3. SUBSEQUENT RE-TEST	13	0	13	0.00%
2012	L	1. INITIAL TEST	90,347	2,326	92,673	2.51%
	L	2. FIRST RE-TEST	1,821	412	2,233	18.45%
	L	3. SUBSEQUENT RE-TEST	371	187	558	33.51%
2011	L	1. INITIAL TEST	84,110	2,812	86,922	3.24%
	L	2. FIRST RE-TEST	2,293	536	2,829	18.95%
	L	3. SUBSEQUENT RE-TEST	495	247	742	33.29%
2010	L	1. INITIAL TEST	70,606	2,736	73,342	3.73%
	L	2. FIRST RE-TEST	2,251	513	2,764	18.56%
	L	3. SUBSEQUENT RE-TEST	489	230	719	31.99%
2009	L	1. INITIAL TEST	56,879	2,811	59,690	4.71%
	L	2. FIRST RE-TEST	2,279	485	2,764	17.55%
	L	3. SUBSEQUENT RE-TEST	451	216	667	32.38%
2008	L	1. INITIAL TEST	75,139	4,406	79,545	5.54%
	L	2. FIRST RE-TEST	3,592	745	4,337	17.18%
	L	3. SUBSEQUENT RE-TEST	654	296	950	31.16%
2007	L	1. INITIAL TEST	72,740	5,351	78,091	6.85%
	L	2. FIRST RE-TEST	4,254	934	5,188	18.00%
	L	3. SUBSEQUENT RE-TEST	813	355	1,168	30.39%
2006	L	1. INITIAL TEST	67,149	6,671	73,820	9.04%
	L	2. FIRST RE-TEST	5,110	1,269	6,379	19.89%
	L	3. SUBSEQUENT RE-TEST	1,126	616	1,742	35.36%

Calendar Year 2014 – OBD Emissions Test Results (cont.)						
Year	Type	TEST SEQUENCE	PASS	FAIL	Total	% Fail
2005	L	1. INITIAL TEST	67,860	8,253	76,113	10.84%
	L	2. FIRST RE-TEST	6,286	1,496	7,782	19.22%
	L	3. SUBSEQUENT RE-TEST	1,268	618	1,886	32.77%
2004	L	1. INITIAL TEST	62,055	8,968	71,023	12.63%
	L	2. FIRST RE-TEST	6,522	1,755	8,277	21.20%
	L	3. SUBSEQUENT RE-TEST	1,510	839	2,349	35.72%
2003	L	1. INITIAL TEST	52,869	9,689	62,558	15.49%
	L	2. FIRST RE-TEST	6,744	2,069	8,813	23.48%
	L	3. SUBSEQUENT RE-TEST	1,758	1,063	2,821	37.68%
2002	L	1. INITIAL TEST	44,265	9,633	53,898	17.87%
	L	2. FIRST RE-TEST	6,513	2,130	8,643	24.64%
	L	3. SUBSEQUENT RE-TEST	1,740	1,138	2,878	39.54%
2001	L	1. INITIAL TEST	34,410	9,488	43,898	21.61%
	L	2. FIRST RE-TEST	5,972	2,423	8,395	28.86%
	L	3. SUBSEQUENT RE-TEST	1,909	1,564	3,473	45.03%
2000	L	1. INITIAL TEST	31,080	6,986	38,066	18.35%
	L	2. FIRST RE-TEST	4,804	1,217	6,021	20.21%
	L	3. SUBSEQUENT RE-TEST	950	571	1,521	37.54%
1999	L	1. INITIAL TEST	23,755	5,384	29,139	18.48%
	L	2. FIRST RE-TEST	3,638	1,010	4,648	21.73%
	L	3. SUBSEQUENT RE-TEST	761	470	1,231	38.18%
1998	L	1. INITIAL TEST	18,307	4,444	22,751	19.53%
	L	2. FIRST RE-TEST	2,945	858	3,803	22.56%
	L	3. SUBSEQUENT RE-TEST	627	397	1,024	38.77%
1997	L	1. INITIAL TEST	13,747	3,212	16,959	18.94%
	L	2. FIRST RE-TEST	2,074	594	2,668	22.26%
	L	3. SUBSEQUENT RE-TEST	438	353	791	44.63%
1996	L	1. INITIAL TEST	9,024	2,043	11,067	18.46%
	L	2. FIRST RE-TEST	1,321	402	1,723	23.33%
	L	3. SUBSEQUENT RE-TEST	289	185	474	39.03%
		Initial Tests Totals	1,090,828	96,261	1,187,089	8.11%
		Overall Test Totals	1,175,991	124,476	1,300,467	9.57%

NOTE: Due to the timing of OBD tests/re-tests, there is no direct relationship between Initial Test failures and Re-test counts (i.e. Initial Tests and Re-tests may have occurred for a particular vehicle during different calendar years).

- (a)(2) By model year and vehicle type, the number and percentage of vehicles:
 (vi) Vehicles with no known final outcome (regardless of reason).

Calendar Year 2014 - No Final Outcome Vehicles				
Model Year	Type	NFO Total	Total tested	Total %
2016	L	0	37	0.00%
2015	L	3	19,929	0.02%
2014	L	19	102,411	0.02%
2013	L	27	95,157	0.03%
2012	L	227	92,673	0.24%
2011	L	266	86,922	0.31%
2010	L	292	73,342	0.40%
2009	L	324	59,690	0.54%
2008	L	539	79,545	0.68%
2007	L	733	78,091	0.94%
2006	L	955	73,820	1.29%
2005	L	1,245	76,113	1.64%
2004	L	1,488	71,023	2.10%
2003	L	1,790	62,558	2.86%
2002	L	1,964	53,898	3.64%
2001	L	2,168	43,898	4.94%
2000	L	1,704	38,066	4.48%
1999	L	1,376	29,139	4.72%
1998	L	1,198	22,751	5.27%
1997	L	923	16,959	5.44%
1996	L	624	11,067	5.64%
1995	L	24	9,595	0.25%
Totals		17,889	1,196,684	1.49%

NOTE: NFO totals above include: 1) Vehicles that were initially tested, but not re-tested; and 2) Vehicles failing Initial Tests & all Re-tests. This date reflects any re-tests within 5-months of initial failure even if the re-test occurred in the subsequent calendar year.

(a)(2) By model year and vehicle type, the number and percentage of vehicles:

(xi) Passing the on-board diagnostic check;

(xii) Failing the on-board diagnostic check;

(xix) MIL is commanded on and no codes are stored;

(xx) MIL is not commanded on and codes are stored;

(xxi) MIL is commanded on and codes are stored;

(xxii) MIL is not commanded on and codes are not stored;

(xxiii) Readiness status indicates that the evaluation is not complete for any module supported by on-board diagnostic systems;

2014 OBD Test Results – Light Duty Vehicles - All Test Sequences (Initial Tests & Retests)																
Year	OBD Test Results				MIL Commanded On				MIL Not Commanded On				Vehicles Not Ready			
	Fail	Fail %	Pass	Pass %	No DTCs stored	%	DTCs stored	%	No DTCs stored	%	DTCs stored	%	No DTCs stored	%	DTCs stored	%
2016	1	2.63%	37	97.37%	0	0.00%	0	0.00%	22	57.89%	0	0.00%	0	0.00%	0	0.00%
2015	81	0.40%	19,924	99.60%	0	0.00%	12	0.06%	11,055	55.26%	30	0.15%	0	0.00%	0	0.00%
2014	475	0.46%	102,395	99.54%	2	0.00%	89	0.09%	72,939	70.90%	398	0.39%	0	0.00%	0	0.00%
2013	513	0.54%	95,225	99.46%	3	0.00%	148	0.15%	91,625	95.70%	767	0.80%	0	0.00%	0	0.00%
2012	2,925	3.06%	92,539	96.94%	0	0.00%	219	0.23%	91,514	95.86%	1,057	1.11%	2,185	2.29%	47	0.05%
2011	3,595	3.97%	86,898	96.03%	2	0.00%	355	0.39%	85,584	94.58%	1,359	1.50%	2,796	3.09%	23	0.03%
2010	3,479	4.53%	73,346	95.47%	1	0.00%	546	0.71%	71,940	93.64%	1,451	1.89%	2,580	3.36%	20	0.03%
2009	3,512	5.56%	59,609	94.44%	2	0.00%	720	1.14%	57,865	91.67%	1,773	2.81%	2,431	3.85%	42	0.07%
2008	5,447	6.42%	79,385	93.58%	4	0.00%	1,321	1.56%	76,242	89.87%	3,211	3.79%	3,663	4.32%	56	0.07%
2007	6,640	7.86%	77,807	92.14%	14	0.02%	1,782	2.11%	73,578	87.13%	4,280	5.07%	4,282	5.07%	67	0.08%
2006	8,556	10.44%	73,385	89.56%	21	0.03%	2,347	2.86%	67,930	82.90%	5,493	6.70%	5,541	6.76%	139	0.17%
2005	10,367	12.09%	75,414	87.91%	14	0.02%	3,068	3.58%	69,406	80.91%	6,056	7.06%	6,616	7.71%	137	0.16%
2004	11,562	14.16%	70,087	85.84%	12	0.01%	3,481	4.26%	63,515	77.79%	6,622	8.11%	7,349	9.00%	221	0.27%
2003	12,821	17.28%	61,371	82.72%	15	0.02%	4,010	5.40%	55,467	74.76%	5,958	8.03%	7,988	10.77%	288	0.39%
2002	12,901	19.72%	52,518	80.28%	5	0.01%	4,180	6.39%	46,494	71.07%	6,031	9.22%	8,045	12.30%	267	0.41%
2001	13,475	24.16%	42,291	75.84%	1	0.00%	4,232	7.59%	37,348	66.97%	4,883	8.76%	8,550	15.33%	267	0.48%
2000	8,774	19.24%	36,834	80.76%	1	0.00%	3,576	7.84%	32,651	71.59%	4,173	9.15%	4,609	10.11%	176	0.39%
1999	6,864	19.60%	28,154	80.40%	3	0.01%	2,718	7.76%	24,881	71.05%	3,260	9.31%	3,699	10.56%	137	0.39%
1998	5,699	20.67%	21,879	79.33%	1	0.00%	2,544	9.22%	18,537	67.22%	2,695	9.77%	2,846	10.32%	96	0.35%
1997	4,159	20.37%	16,259	79.63%	0	0.00%	1,879	9.20%	14,232	69.70%	1,764	8.64%	2,041	10.00%	69	0.34%
1996	2,630	19.83%	10,634	80.17%	2	0.02%	1,341	10.11%	8,849	66.71%	1,196	9.02%	1,123	8.47%	68	0.51%
Total	124,476	9.57%	1,175,991	90.43%	103	0.01%	38,568	2.97%	1,071,674	82.41%	62,457	5.51%	76,344	5.87%	2,120	0.16%

(a)(3) The initial test volume by model year and test station;

Documentation provided electronically in Excel file.

(a)(4) The initial test failure rate by model year and test station.

Documentation provided electronically in Excel file.